

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
Plate-Rite Plating Site - Removal Polrep



EPA Region 5 Records Ctr.



373705

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
*Region V*

**Subject:**           **POLREP #4**  
                  **FINAL POLREP**  
                  **Plate-Rite Plating Site**  
                  **B5YL**  
                  **Dayton, OH**  
                  **Latitude: 39.8476384 Longitude: -84.2173403**

**To:**               Steven Renninger, U.S. EPA  
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                  Andrew Steele, Dayton Fire Department  
                  Randy Watterworth, DERR  
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**From:** Steven Renninger, On-Scene Coordinator  
**Date:** 2/22/2011  
**Reporting Period:** December 24, 2010 through February 22, 2011

## **1. Introduction**

### **1.1 Background**

<b>Site Number:</b>	B5YL	<b>Contract Number:</b>	EP-S5-08-02
<b>D.O. Number:</b>	EP-G105-00064	<b>Action Memo Date:</b>	9/23/2010
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	Time-Critical
<b>Response Lead:</b>	EPA	<b>Incident Category:</b>	Removal Action
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>	10/18/2010	<b>Start Date:</b>	10/18/2010
<b>Demob Date:</b>	2/22/2011	<b>Completion Date:</b>	2/22/2011
<b>CERCLIS ID:</b>	OHN 000 510 495	<b>RCRIS ID:</b>	
<b>ERNS No.:</b>		<b>State Notification:</b>	Ohio EPA notified
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

#### **1.1.1 Incident Category**

Time-Critical Removal Action

#### **1.1.2 Site Description**

The Plate-Rite (PR) Plating Site includes one 13,000-square-foot building in Dayton, Ohio. The Site is located

in a mixed residential, commercial, and industrial area. The Site is bordered to the north by a residential property, to the south by a commercial building, to the east by a residential property and Webster Street, and to the west by a wooded area. The Site is located within 200 feet of residential areas and within 500 feet of commercial businesses. The Site is also located approximately 1.5 miles north of the Great Miami River.

The on-site building contained numerous plating tanks, pits, 55-gallon drums, containers and laboratory chemicals containing hazardous wastes.

#### **1.1.2.1 Location**

The PR Plating Site is located at 5311 Webster Street in Dayton, Montgomery County, Ohio. The Site's geographical coordinates are 39° 49' 2.28" North latitude and 84° 10' 51.996" West longitude.

#### **1.1.2.2 Description of Threat**

Electroplating operations began at the PR Plating Site in 1985 and ceased in 2007. Bohn-Jur, Co., is the current Site owner.

In February 1985, the Plate-Rite Co., Inc., began plating operations at the Site and provided product to various industries such as the medical, food service, appliance, automotive, and tool room industries. The company electroplated a host of surfaces, including aluminum, cast iron, carbon steel, stainless steel, brass, copper, and zinc castings. The company also worked with plating finishes that included copper, multi-layer nickel, zincating, decorative chrome, polished nickel chrome, nickel plate satin finish. On August 3, 2005, the company voluntarily dissolved.

In December 2005, Master Vision Plating, LLC (MV), was formed. MV leased the Site from the Bohn-Jur, Co., and conducted electroplating operations until 2007.

On June 1, 2010, the Harrison Township Fire Department (HTFD) conducted a fire safety inspection at the on-site building. The HTFD found numerous fire code violations and also observed the following:

- 21 plating tanks (approximately 1,000 gallons each) with liquids and solids;
- Three underground storage pits;
- 150 to 200 containers, most containing cyanides, acids, nickel, copper, and alkalines;
- One pallet of flammable material (paints);
- A laboratory with numerous small containers of chemicals;
- Spillage between tanks in the dip tank room; and
- Leaking 55-gallon drums.

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The HTFD noted that since 2007, local authorities responded to reports of breaking and entering of the Site on eight different occasions. The most recent break-in occurred the weekend of July 17, 2010.

On June 18, 2010, the HTFD submitted a letter to U.S. EPA requesting assistance in conducting a time-critical removal action at the Site.

On July 22, 2010, U.S. EPA conducted a site assessment at the PR Plating Site.

On August 17, 2010, the Ohio Environmental Protection Agency (OEPA) requested assistance from the U.S. EPA in conducting a potential time-critical removal action involving numerous abandoned plating tanks, drums, and containers of plating waste at the Site.

### **1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results**

On July 22, 2010, U.S. EPA conducted a site assessment at the PR Plating Site and observed and documented the presence of approximately 21 plating tanks, three underground storage pits, a laboratory, and approximately 200 55-gallon drums and small containers of liquid and solid wastes located throughout the on-site building. U.S. EPA collected 15 investigative liquid waste and 4 investigative solid waste samples from plating tanks, 55-gallon drums, containers, and the floor of the building. Based on analytical results for the samples collected during the site assessment, the drums and containers contain corrosive, caustic, and flammable liquids, and the plating tanks and drums contain TCLP arsenic (D004), TCLP cadmium (D006), TCLP chromium (D007), TCLP lead (D008), and cyanide-bearing toxic wastes.

Hazardous wastes identified at the Site exhibited the following characteristics:

- Ignitability;
- Corrosivity;
- Reactivity; and
- Toxicity.

Based on the analytical results and Site conditions observed during the site assessment, the Site meets the criteria for a removal action pursuant to 40 CFR 300.415(b)(2).

## **2. Current Activities**

### **2.1 Operations Section**

#### **2.1.1 Narrative**

On September 9, 2010, the Emergency Contingency Plan was finalized by U.S. EPA and distributed to the HTFD.

On September 23, 2010, the Action Memorandum was signed by the Director of the U.S. EPA Region V Superfund Division approving the removal action at the PR Plating Site.

On September 30, 2010, a delivery order was issued to the ERRS contractor (EQM) to conduct removal activities at the site.

On October 25, 2010, U.S. EPA initiated removal activities at the site.

Between October 27 - November 19, 2010, the following site activities were completed: Site security, air monitoring, sampling and haz catting of wastestreams, bulking of wastes, initiation of off-site disposal. See POLREP 2 for further detail of November 2010 activities.

Between November 20 - December 23, 2010, the following site activities were completed: Site

security, air monitoring, continued bulking of wastes, continued off-site disposal of wastes, and began dismantling plating process area. See POLREP 3 for further site details.

## **2.1.2 Response Actions to Date**

### Week of December 27, 2010

No site work was conducted during this week - Holiday Break. Site security was on site 24-hrs during this week.

### Week of January 3, 2011

ERRS completed dismantling the plating process area and continued sizing hazardous debris and cutting up vats. The vat cutting was being conducted in Level B PPE.

ERRS completed consolidating the remaining solids/sludge from each of the remaining plating vats in the plating room. ERRS filled up two 20-yd rolloff boxes with the solid/sludge material (profiled under the name "floor residue").

On January 4, 2011, one non-hazardous debris rolloff box was transported for offsite disposal to Stony Hollow Landfill, Dayton, Ohio.

### Week of January 10, 2011

No site work was conducted during this week. Site security was on site 24-hrs during this week.

### Week of January 17, 2011

ERRS transported out two PCB transformers for off-site disposal to Clean Harbors, Twinsburg, Ohio. The PCB oil concentration in each transformer ranged from 288 milligrams per kilogram (mg/kg) to 562 mg/kg.

### Week of January 24, 2011

No site work was conducted during this week. Site security was on site 24-hrs during this week.

### Week of January 31, 2011

No site work was conducted during this week. Site security was on site 24-hrs during this week.

### Week of February 7, 2011

ERRS continued sizing hazardous debris and cutting up vats. The vat cutting was conducted in Level B PPE.

ERRS mobilized a manlift and completed removing all overhead piping and plating process debris from the ceiling in the plating room and the buffing room.

ERRS completed sweeping the plating room floor. A hot pressure washer was mobilized and ERRS began decontaminating the Plating Room walls and flooring. A cleaning solution was used to pre-treat the walls and flooring and then hot pressure washer was used to rinse.

On February 7, 2011, ERRS transported one 20-yd rolloff box of hazardous "floor residue" to EQ,

Detroit, MI for off-site disposal.

Week of February 14, 2011

ERRS completed sizing hazardous debris and cutting up vats. The vat cutting was conducted in Level B PPE.

ERRS completed decontaminating the Plating Room and the Buffing Room floors and walls with a cleaning solution and hot pressure rinse water. All decon water was staged into poly totes for off-site disposal. ERRS completed sweeping the Grinding and Main Storage rooms.

On February 14, 2011, one non-hazardous debris rolloff box was transported for offsite disposal to Stony Hollow Landfill, Dayton, Ohio.

On February 14, 2011, one 20-cubic yard rolloff box of hazardous debris was transported for off-site disposal to Heritage Environmental Services, Indianapolis, Indiana.

On February 17, 2011, ERRS subcontracted a floor drain cleaning company to mobilize to the site and clean out all of the floor drains on site.

On February 18, 2011, two 20-cubic yard rolloff boxes of hazardous debris were transported for off-site disposal to Heritage Environmental Services, Indianapolis, Indiana.

On February 18, 2011, ERRS completed filling in the main plating line containment pit with concrete.

Week of February 21, 2011

On February 21, 2011, ERRS transported 1,400 gallons of contaminated decon water to EQ, Detroit, MI for off-site disposal.

ERRS completed sealing the plating room floor and walls.

On February 22, 2011, ERRS transported one 20-yd rolloff box of hazardous "floor residue" to EQ, Detroit, MI for off-site disposal.

On February 22, 2011, one non-hazardous debris rolloff box was transported for offsite disposal to Stony Hollow Landfill, Dayton, Ohio.

On February 22, 2011, U.S. EPA met with the Harrison Township Fire Department and Ohio EPA and conducted a tour of the completed removal action.

ERRS demobilized from the site on February 23, 2011. All site work is completed.

The electricity was disconnected and the two office trailers will be demobilized on February 24 and 25, 2011.

**2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)**

U.S. EPA has identified various PRPs for this Site, but none of the identified PRPs were capable to fund the removal action.

#### 2.1.4 FINAL DISPOSAL SUMMARY TABLE

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
Non-hazardous debris (wood, boxes, trash, etc.)	Solid	13 rolloff boxes		Landfill	Waste Management - Stony Hollow Landfill Dayton, Ohio
Hazardous Debris (F008)	Solid	8 rolloff boxes		Hazardous Landfill	Heritage Environmental Indianapolis, Indiana
Scrap Steel	Solid	16.51 tons		Recycle	Franklin Iron & Scrap Dayton, Ohio
Compressed Gas Cylinders	Gas Cylinders	19 each		Re-use	Wieler Welding and Ferrell Gas Dayton, Ohio
Lab Pack (Oxidizer Liquids, Toxic Liquids, HCl, Corrosive Liquids, Sodium Lamps, Batteries, aerosols, paint, hydrogen peroxide)	Solid, Liquid and Gas	11 drums		Various	EQ Detroit, Michigan
Chromic Acid Liquid	Liquid	4,376 gallons		Treatment	PSC (Vickery) Vickery, Ohio
Acid Liquid	Liquid	1,800 gallons		Treatment	PSC (Vickery) Vickery, Ohio
Neutral Liquid - Hazardous	Liquid	4,347 gallons		Treatment	PSC (Vickery) Vickery, Ohio
Flammable Liquid	Liquid	1 drum		Fuels	Clean Waters

				Blending	Limited Dayton, Ohio
Cyanide solids (pure product)	Solid	3 drums		Treatment	Cyanide Destruct Systems
Cyanide Liquid	Liquid	500 gallons (2 totes)		Treatment	PSC Detroit, Michigan
Caustic Liquid	Liquid	2,000 gallons		Treatment	PSC (Vickery) Vickery, Ohio
Caustic solids (dry solids)	Solid	11 drums		Treatment	Petro-Chem Detroit, Michigan
Plating residue (floor sweepings)	Solid	2 rolloff boxes		Hazardous Landfill	EQ Detroit, Michigan
Cyanide sludge	Sludge	3 drums		Treatment	PSC Detroit, Michigan
PCB Transformers	Solid and Liquid	2 each		Incineration	Clean Harbors Twinsburg, Ohio
Ammonium Bifluoride	Solid	2 drums		Treatment	Petro-Chem Detroit, Michigan
Boric Acid	Solid	1 drum		Treatment	Petro-Chem Detroit, Michigan
Hazardous decon water (chrome, barium, lead)	Liquid	1,400 gallons		Treatment	PSC (Vickery) Vickery, Ohio

## 2.2 Planning Section



## 2.2.1 Anticipated Activities

No further action.

## 2.2.1.1 Planned Response Activities

See Section 2.2.1.2.

## 2.2.1.2 Next Steps

None.

All site work is completed and all personnel demobilized from the site on February 22, 2011

## 2.2.2 Issues

None.

Removal is completed.

## 2.3 Logistics Section

## 2.4 Finance Section

### 2.4.1 Narrative

#### Estimated Costs \*

	Budgeted	Total To Date	Remaining	% Remaining
<b>Extramural Costs</b>				
ERRS - Cleanup Contractor	\$425,000.00	\$395,300.00	\$29,700.00	6.99%
TAT/START	\$44,000.00	\$37,000.00	\$7,000.00	15.91%
<b>Intramural Costs</b>				
USEPA - Direct	\$36,000.00	\$30,000.00	\$6,000.00	16.67%
<b>Total Site Costs</b>				
	\$505,000.00	\$462,300.00	\$42,700.00	8.46%

\* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact

monetary figure which the government may include in any claim for cost recovery.

## **2.5 Safety Officer**

On October 21, 2010, the Site H&S Plan was finalized.

On October 25, 2010, all site personnel read and signed the approved H&S Plan.

## **2.6 Liaison Officer**

## **2.7 Information Officer**

### **2.7.1 Public Information Officer**

### **2.7.2 Community Involvement Coordinator**

## **3. Participating Entities**

### **3.1 Unified Command**

### **3.2 Cooperating and Assisting Agencies**

Harrison Township Fire Department - Mark Lynch

Ohio EPA DERR - Dave Combs, Jim Crawford

## **4. Personnel On Site**

U.S. EPA -- 1 OSC

START -- 1 WESTON START

ERRS -- 3 EQM and 3 Inland Waters of Ohio

## **5. Definition of Terms**

## **6. Additional sources of information**

### **6.1 Internet location of additional information/reports**

For additional information such as a copy of "U.S. EPA's Site Assessment Report" or the "Emergency Contingency Plan", please refer to the "Documents" Section of the project website <http://www.epaosc.org/>.

### **6.2 Reporting Schedule**

This is the final POLREP.

## **7. Situational Reference Materials**